

KENNETH WRIGHT
15 W. ROYAL AVENUE
LINWOOD, NEW JERSEY 08221
609-432-0552

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ

2018 AUG 17 P 1:14

JEANNE A. HAUGHTON

BY: 
DEPUTY CLERK

August 14, 2018

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
KENNETH E. WRIGHT A/KA
KENNETH WRIGHT D/B/A THE : CASE NO. 18-15336-JNP
WOOD DOCTOR
Debtor(s)

: NOTICE OF MOTION PURSUANT
: TO 11USC 363 (b)(f) RULE2002
: (a) (2) AND 11 USC 554 (b) TO
: COMPELL TRUSTEE TO
: ABANDON AND SELL
: PROPERTY FREE AND CLEAR
: OF LIENS AND ENCUMBRANCES
: ON SHORTENED NOTICE

FEDERAL NATIONAL MORTGAGE ASSOCIATION
c/o PHELAN HALLINAN DIAMOND & JONES, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
856-813-5500

ISABEL C. BALBOA
CHAPTER 13 STANDING TRUSTEE
CHERRY TREE CORPORATE CENTER
535 ROUTE 38 - SUITE 580
CHERRY HILL, NJ 08002

U.S. TRUSTEE
U.S. DEPT OF JUSTICE
OFFICE OF THE US TRUSTEE
ONE NEWARK CENTER STE
2100 NEWARK, NJ 07102

Notice to Creditors and other Parties in Interest with Standing of Motion to Abandon and sell property free and clear of liens and encumbrances with full satisfaction and release of mortgage.

PLEASE TAKE NOTICE THAT ON BEHALF OF KENNETH E. WRIGHT, the undersigned will move before the United States Bankruptcy Court, FOURTH FLOOR, Camden, New Jersey seeking leave of the Court and approval of the Trustee to Abandon and conduct a private sale of all rights, title, and interest in and to assets of the bankruptcy estate of KENNETH E. WRIGHT located and known as 424 WEST AVENUE OCEAN CITY, NEW JERSEY 08226 to **Private individuals** through a professional Real Estate Agent for the sum of \$270,000.000 dollars. The sale is to be free and clear of all liens and encumbrances, claims, charges, fees, and any expenses. A portion of the proceeds of the sale will be utilized to provide Adequate Protection for Creditors based upon allowed contested Proof Of Claim and other Parties in Interest with Standing on the remaining Property and assets of the estate of KENNETH E. WRIGHT established as of March 19, 2018, the date of the filing of the bankruptcy petition.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, Debtor(s) as Movant will rely upon the Certification in support and the proposed Order submitted herewith, as well as, oral arguments, exhibits, and other documents, if required and necessary.

Without Prejudice UCC 1-308

I Reserve the right to Amend this document

By *Wright, Kenneth Everett* ^(D) Agent
Wright, Kenneth Everett